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July 29, 2022

BY ECF

The Honorable Lewis A. Kaplan United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, New York, NY 10007-1312

Re: United States v. Abdel-Wadood, 19 Cr. 233 (LAK)

Dear Judge Kaplan:

We write, with consent of the government (AUSA Andrew Thomas) and Pretrial Services, to request permission for Mr. Abdel-Wadood to temporarily obtain his Maltese passport from Pretrial Services for the sole purpose of renewing his minor daughter's Maltese passport.

Mr. Abdel-Wadood's family members are dual Egyptian/Maltese citizens. His minor daughter, who currently resides in the United Arab Emirates, must renew her Maltese passport at the Maltese Embassy in Abu Dhabi. To renew the passport of a minor, the Maltese Embassy requires the physical presence of one parent and the original passport of the parent who will not be present for the passport renewal appointment. Mr. Abdel-Wadood's wife will accompany their daughter to the passport renewal appointment, and they will require Mr. Abdel-Wadood's original Maltese passport, which is currently being held by Pretrial Services.

If the Court grants this request, Mr. Abdel-Wadood's son, who is traveling from the United States to Dubai at the end of next week, will transport Mr. Abdel-Wadood's passport and provide it to his mother, who will hold the passport for the duration of the renewal process, which is expected to take several weeks. Upon completion of the process, Mr. Abdel-Wadood would return his Maltese passport to Pretrial Services.

Respectfully submitted,

Sean Hecker

Shawn G. Crowley

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Counsel for Mr. Mustafa Abdel-Wadood

cc: AUSA Andrew Thomas (by ECF)
Pretrial Services Officer Stephen Boose

SO PRETED

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8/1/22